

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

Master File No. 1:00 – 1898
MDL 1358 (SAS)
M21-88

This Document Relates To:

The Honorable Shira A. Scheindlin

Orange County Water District v. Unocal Corporation,
et al., Case No. 04 Civ. 4968 (SAS).

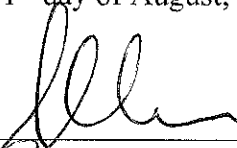
**REPLY DECLARATION OF PETER C. CONDRON IN SUPPORT OF BP AND THE SHELL
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

PETER C. CONDRON, under penalty of perjury, declares as follows:

1. I am admitted to practice before this Court and am an attorney at Sedgwick LLP, attorneys of record for Shell Oil Company, Equilon Enterprises LLC, and Texaco Refining and Marketing Inc. (the "Shell Defendants"). This Declaration is based on my personal knowledge and, if called as a witness, I could testify competently thereto.
2. Attached hereto as Exhibit A are true and correct copies of relevant portions of the Response of Orange County Water District to Reorganized Debtor's Objection to Claim No. 1291, filed in *In re Mark IV Indus.*, No. 09BK12795 (Bankr. S.D.N.Y.), on or about August 31, 2010.
3. Attached hereto as Exhibit B are true and correct copies of relevant portions of the transcript of the January 5, 2005 hearing in *People v. Shell Oil Co., et al.*
4. Attached hereto as Exhibit C is a true and correct copy of Exhibit A from the Orange County District Attorney's First Amended Complaint in *People v. Shell Oil Co., et al.*
5. Attached hereto as Exhibit C is a true and correct copy of Exhibit A from the Final Judgment entered by the Orange County Superior Court in *People v. Shell Oil Co., et al.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Washington, D.C., on this 11th day of August, 2014.



Peter C. Condrón